

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

JAB Energy Solutions II, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 21-11226 (CTG)

**Re: D.I. 160, \_\_**

**ORDER SHORTENING NOTICE AND CONSIDERATION MOTION OF TURNKEY  
OFFSHORE PROJECT SERVICES, LLC AND OFFSHORE TECHNICAL  
SOLUTIONS, LLC'S CROSS-MOTION FOR ENTRY OF AN ORDER MODIFYING  
THE AUTOMATIC STAY**

Upon the motion (the "Motion to Shorten")<sup>2</sup> of Turnkey Offshore Project Services, LLC ("TOPS") and Offshore Technical Solutions, LLC ("OTS," and together with TOPS, the "Movants") for entry of an order (this "Order") shortening notice and consideration of the Cross-Motion; the Court having reviewed the Motion to Shorten and found that the relief requested therein is justified under the circumstances,

**IT IS HEREBY ORDERED THAT:**

1. The Motion to Shorten is GRANTED.
2. The Cross-Motion will be considered at the hearing scheduled for February 24, 2022 at 10:00am (ET) (the "Hearing").
3. Responses, if any, to the relief requested in the Cross-Motion must be made at the time of the Hearing.

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<sup>1</sup> The last four digits of the Debtor's U.S. tax identification number are 3625. The Debtor's mailing address is 19221 I-45 South, Ste. 324, Shenandoah, TX 77385.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion to Shorten.

4. This Court retains jurisdiction to construe and enforce the terms of this Order.